

REMARKS

Claims 1-15 are pending and stand rejected. Reconsideration and continued examination are respectfully requested.

Claims 1-15 were rejected under 35 U.S.C. § 101. Examiner has indicated that the claims are directed to subject matter "without practical application that produces any useful, tangible, and concrete results". Assignee has amended claims 1, 4, 8, 11, and 15 to include, among other limitations, "providing a particular one of the portions/macroblocks of either the first frame or the second frame upon receiving a request for the particular one of the portions/macroblocks", and submits that the foregoing overcomes the rejection.

Claim 1 was rejected under 35 U.S.C. § 103(a) as being obvious from Inoue in view of Kadono. Claim 8 was rejected under 35 U.S.C. § 102(b) as being anticipated by Inoue. Claim 1 is now amended to recite, among other limitations, "storing a portion of a first frame in a row of a bank of a memory; storing a portion of a second frame in the same row of the same bank of the memory" (Emphasis Added).

Assignee respectfully submits that Inoue does not teach the foregoing. As Examiner has noted, "Inoue discloses storing a portion (macroblock) of a first frame in a (first channel) row of memory (Fig. 2B, 220A; Fig. 3A, 212, Channel A; Fig. 4B, Row0), and storing a portion of a second frame in the (second channel) row of memory (Fig. 2b, 220B; Fig. 3A, 212, channel B; Fig. 4B, Row136)". It is respectfully submitted that "storing a portion (macroblock) of a first frame in a (first channel)" and "storing a portion (macroblock) of a second frame in the (second channel)" results in storage in different banks, because

"each channel (A, B and C) includes two memory devices, 244 and 246 which hold the actual data. Each memory device, in turn, is divided into two banks" Col. 4, Line 65 - Col. 5, Line 1. Clearly, storage in one channel results in storage in a different bank in Inoue. Accordingly, for at least the foregoing reasons, Assignee respectfully requests that Examiner withdraw the rejection to claims 1 and 8, and to dependent claims 2, 3, 9, and 10.

Claim 16 is added and recites, among other limitations, "storing a portion of a first frame in a row of a bank of a memory further comprises storing the portion of the first frame in the row of the bank in a first memory device; and storing a portion of a second frame in the same row of the same bank of the memory further comprises storing the portion of the first frame in the same row of the same bank of the same memory device". Clearly, "storing a portion (macroblock) of a first frame in a (first channel)" and "storing a portion (macroblock) of a second frame in the (second channel)" results in storage in different memory devices, because "each channel (A, B and C) includes two memory devices, 244 and 246 which hold the actual data." Col. 4, Line 65 - Col. 5, Line 1. Accordingly, Assignee respectfully requests allowance of claim 16.

Additionally, Assignee respectfully disagrees that "multi image memory (212) is stored as concatenated images/frames (each Field comprises Bank 0 and Bank 1, wherein a frame comprises two Fields), which is the substantially the same/similar layout as Applicant's Fig. 8 (comprises Bank 0 - Bank 3)." Assignee calls Examiner's attention to the fact that in Applicant's Figure 8, it is

the subscript notations that indicate different frames, while the alphabetical notations indicate image rows.

Claim 4 was rejected under 35 U.S.C. § 103(a) as being obvious from Inoue in view of Kadono. Claim 11 was rejected under 35 U.S.C. 102(b) as being anticipated by Inoue. Claim 4 is amended to recite, among other limitations, "a particular one of the first one or more rows of memory being adjacent to a particular one of the second one or more rows in the same bank of memory". Examiner has indicated that Inoue teaches "a particular one of the first one or more rows of memory being adjacent to a particular one of the second one or more rows of memory (Fig. 2B, 220A-220B; Fig. 3A, 212, channels A-B; Fig. 4B, Field A0 and B0). As noted above, storage in channels A and B would result in different banks. Accordingly, Inoue does not teach "a particular one of the first one or more rows of memory being adjacent to a particular one of the second one or more rows in the same bank of memory". Accordingly, Examiner is respectfully requested to withdraw the rejection to claims 4 and 11 as now amended.

CONCLUSION

For at least the foregoing reasons, each of the pending claims are allowable, thereby placing the application in a condition for allowance. Examiner is requested to pass this case to issuance.

The Commissioner is hereby authorized to charge any deficiency in the amount enclosed or any additional fees which may be required under 37 CFR 1.16 or 1.17 to Deposit Account No. 13-0017 in the name of McAndrews, Held & Malloy, Ltd.

RESPECTFULLY SUBMITTED,



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Mirut Dalal
Attorney for Assignee
Reg. No. 44,052

McANDREWS, HELD & MALLOY, LTD.
500 W. Madison - 34th Floor
Chicago, IL 60661

Phone: (312) 775-8000
FAX: (312) 775-8100